

January 15, 1999

This document was submitted to EPA by a registrant in connection with EPA's evaluation of this chemical, and it is presented here exactly as submitted.

November 30, 1998

Ms. Marcia Mulkey
Director
Office of Pesticide Programs
U.S. Environmental Protection Agency
401 M Street S.W.
Washington, DC 20460

<p>SUBJECT: METHIDITHION; EPA REG. NO. 100-530. INITIAL REVIEW PERIOD FOR EFED DRAFT RED CHAPTER</p>
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Dear Ms. Mulkey,

Novartis has received the methidathion EFED pre-final RED chapter for review and noticed with alarm that the initial review period for Novartis to correct errors is only 15 days. Novartis had understood that as an outcome of the agreements of the TRAC process, registrants would have 30 days in which to do an initial review for errors and omissions. Both Novartis and Gowan Co., co-owners of the product, must insist that we be given 30 days to examine this RED chapter.

The content of the pre-final chapter was very different from the status of the latest reviews. Novartis was surprised at the significant data requirements and changes in study status made in this document. It will take longer than 15 days to sort out and check these changes. Finally, the chapter was received the Monday of Thanksgiving week when many of the involved colleagues were already on vacation. Thus Novartis lost a week of working time off the top. Therefore, Novartis will submit its comments on errors by December 23, 1998, 30 days after receipt.

If you have any questions or comments, please contact me at (336) 632-2391.

Sincerely,

Dave Whitacre
Vice President
Development

cc: Mr. Mike Goodis, EPA, OPP
 Mr. Jay Vroom, ACPA